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FILED

AUG 19 2013

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) CASE NO. CR 13-0149 JST
14 Plaintiff,)
15 v.) STIPULATION AND [PROPOSED] ORDER TO
16 QUIN NGOC RUDIN,) CONTINUE STATUS CONFERENCE AND TO
17 a/k/a DEAN RUBIN,) EXCLUDE TIME FROM AUGUST 16, 2013
18 a/k/a DAVID RUBIN,) THROUGH SEPTEMBER 27, 2013
19 Defendant.)
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21 The defendant, Quin Ngoc Rudin, a/k/a Dean Rubin, a/k/a David Rudin, represented by Edward
22 Robinson, Esquire, and the government, represented by Kyle F. Waldinger and Hallie Mitchell
23 Hoffman, Assistant United States Attorneys, jointly request to continue the status hearing in the above
24 captioned matter from August 16, 2013 at 10:30 a.m. to September 27, 2013 at 9:30 a.m.. The parties
25 request this continuance because there are ongoing discussions about the appropriate resolution of the
26 matter, and the defense is continuing to review the voluminous discovery that the government provided
27 and to conduct necessary investigation.

28 Counsel further requests that time be excluded under the Speedy Trial Act between August 16,

STIPULATION AND [PROPOSED] ORDER TO CONTINUE AND TO EXCLUDE TIME

1 2013 and September 27, 2013 because the defense needs time for effective preparation of the case.

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3 Dated: August 16, 2013

/s/ Hallie Mitchell Hoffman

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5 Hallie Mitchell Hoffman
6 Assistant United States Attorney

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8 Dated: August 16, 2013

/s/ Edward Robinson

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10 Edward Robinson
11 Attorney for Quin Rudin

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STIPULATION AND [PROPOSED] ORDER TO CONTINUE AND TO EXCLUDE TIME

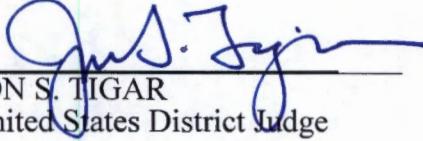
CR 13-0149 JST

1 [PROPOSED] ORDER

2 The parties jointly moved to continue the status conference in this matter to September 27, 2013
3 at 9:30 a.m.. Counsel requested the continuance because the parties are in ongoing discussions about the
4 appropriate resolution of the case and the defense counsel needs additional time to review the
5 voluminous discovery and to conduct necessary investigation.

6 Based upon the representation of counsel and for good cause shown, the Court finds that failing
7 to exclude the time between August 16, 2013 and September 27, 2013 would unreasonably deny the
8 defendant continuity of counsel and would deny counsel the reasonable time necessary for effective
9 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The
10 Court further finds that the ends of justice served by excluding the time between August 16, 2013 and
11 September 27, 2013 from computation under the Speedy Trial Act outweigh the best interests of the
12 public and the defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time between
13 August 16, 2013 and September 27, 2013 shall be excluded from computation under the Speedy Trial
14 Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

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16 DATED: 8/18/13


17 JON S. TIGAR
18 United States District Judge

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28 STIPULATION AND [PROPOSED] ORDER TO CONTINUE AND TO EXCLUDE TIME